

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Case No. 4:23-CV-09
)	
\$115,800.00 IN U.S. CURRENCY)	
FUNDS SEIZED FROM SOUTH)	
GEORGIA BANK ACCOUNT)	
ENDING IN 0378, ET AL.)	
)	
Defendant.)	
)	

AFFIDAVIT IN SUPPORT OF REQUEST TO ENTER DEFAULT

1. I am an Assistant United States Attorney and represent the Plaintiff, the United States of America, in this action.

2. A Verified Complaint for Forfeiture *In Rem* was filed in this case on January 6, 2023. Doc. 1. The Verified Complaint alleges that the Defendants *In Rem*:

- \$115,800.00 in U.S. Currency Funds from South Georgia Bank Account ending in 0378;
- \$21,263.24 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2757;
- \$6,715.85 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2888;
- \$3,168.33 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2837;
- \$578.84 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2896; and

- \$2,665.53 in U.S. Currency Funds from South Georgia Bank Account ending in 0360

(hereinafter, the “Defendant Property”) is subject to forfeiture to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(A) and (a)(1)(C).

3. A Warrant of Arrest was issued by the Clerk of the U.S. District Court on January 6, 2023. Doc. 2.

4. Pursuant to Rule G(5), Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions, a notice was posted on the official government website (www.forfeiture.gov) for at least 30 consecutive days, beginning on January 14, 2023. A Declaration of Publication evidencing said publication was filed with the Court on February 23, 2023. Doc. 5.

5. Service to all potential known claimants, including,

- Brian Thomas Rafferty, Esq.;
- Jeffrey Derby;
- Donald Franklin Samuel, Esq.;
- Christopher Ryan Barnes;
- Rony Denis;
- Marjorie Robertson Denis;
- South Georgia Bank, Attn: Jay W. Hales;
- Gerald Robertson;
- Anthony S. Oloans;
- James B. Benton;
- Steven Sadow, Esq.;

- United States Department of Veteran Affairs, Debt Management Center 189, Attn: Julie Lawrence;
-
- Dennis Nostrant;
- Marcus Labat;
- First Citizens Bank and Trust, Attn: Sharon Crabbe;
- House of Prayer Christian Churches of America, Inc.; and
- Phebe Ruth Denis

(collectively, hereinafter, “all known potential claimants”) was accomplished on or before March 28, 2023. Doc. 7.

6. No known potential claimant, nor any other person or entity has filed a claim or an answer or demanded restitution of the Defendant Property or the right to defend the action within the time period permitted by Rule G(5).

7. I know of no reason why default should not be entered against all known potential claimants; their heirs, successors, and assigns; and all other persons and entities with regard to the Defendant Property.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of May 2023.

JILL E. STEINBERG
UNITED STATES ATTORNEY

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